

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Thaddius Intravaia, *et al.*,

Plaintiffs,

v.

National Rural Electric Cooperative
Association, *et al.*,

Defendants.

Case No. 1:19-cv-00973-LO-IDD

**PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES AND
COSTS, AND CLASS REPRESENTATIVE SERVICE AWARDS**

PLEASE TAKE NOTICE that Plaintiffs Thaddius Intravaia and Steven Marvik (collectively "Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees in the amount of \$3,333,333.33 (one-third of the Gross Settlement Fund) to Class Counsel; (2) reimbursement of \$294,087.10 in expenses that Class Counsel incurred in connection with this action; (3) settlement administration expenses in the amount of \$183,640.00; and (4) service awards in the amount of \$10,000 to each of the named Plaintiffs (\$20,000 total).

This motion is scheduled to be heard at the time of the Fairness Hearing on December 17, 2020 at 10:00 a.m. in the Alexandria Courtroom 1000 of the Albert V. Bryan U. S. Courthouse, 401 Courthouse Square, Alexandria, VA 22314. This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article 8 of the Parties' Class Action Settlement Agreement (ECF No. 99-2), and is based the accompanying Memorandum of Law and authorities cited therein; the Declarations of Brock J. Specht, and Gregg C. Greenberg; the declarations previously submitted by the Class Representatives (ECF Nos. 95-05, 95-06); the Parties' Class

Action Settlement Agreement; the Court's Preliminary Approval Order (ECF No. 97); and all files, records and proceedings in this matter.

Defendants take no position on this motion as parties to the Settlement.

Respectfully Submitted,

Dated: October 20, 2020

/s/ Gregg C. Greenberg
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that, on October 20, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ Gregg C. Greenberg
Gregg C. Greenberg